UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA **Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY, MARISSA BLAIR, APRIL MUÑIZ, MARCUS MARTIN, NATALIE ROMERO, CHELSEA ALVARADO, JOHN DOE, and THOMAS BAKER,

Plaintiffs,

Civil Action No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

v.

JASON KESSLER, et al.,

Defendants.

PLAINTIFFS' MOTION TO SEAL EXHIBITS TO PLAINTIFFS' MOTION TO COMPEL DISCOVERY FROM DEFENDANT ROBERT "AZZMADOR" RAY

On March 11, 2020, Plaintiffs filed a Motion to Compel Discovery from Defendant Robert "Azzmador" Ray (the "Motion to Compel"). ECF No. 673. Plaintiffs hereby respectfully request that the Court enter the enclosed proposed order sealing certain exhibits to the Motion to Compel, as well as certain portions of the Motion to Compel, which were submitted conditionally under seal today in this matter. These exhibits were designated as Highly Confidential by the producing parties or contain Highly Confidential Information as defined by the Order for the Production of Documents and Exchange of Confidential Information dated January 3, 2018, ECF No. 167. Certain portions of the Motion to Compel also contain or convey the substance of certain exhibits that that have been designated as or contain Highly Confidential Information. For the reasons set forth herein, Plaintiffs request that Exhibits 1, 7, 8, 9, 12, 13, 14, 16, 17, and 18 to the Motion to Compel, and the redacted portions of the Motion to Compel be sealed in accordance with Local Rule 9.

Dated: March 11, 2020

Respectfully submitted,

/s/ Robert T. Cahill

Robert T. Cahill (VSB 38562) COOLEY LLP

11951 Freedom Drive, 14th Floor

Reston, VA 20190-5656 Telephone: (703) 456-8000

Fax: (703) 456-8100 rcahill@cooley.com

Of Counsel:

Roberta A. Kaplan (pro hac vice)
Julie E. Fink (pro hac vice)
Gabrielle E. Tenzer (pro hac vice)
Michael L. Bloch (pro hac vice)
KAPLAN HECKER & FINK LLP
350 Fifth Avenue, Suite 7110
New York, NY 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
gtenzer@kaplanhecker.com
mbloch@kaplanhecker.com

Yotam Barkai (pro hac vice) BOIES SCHILLER FLEXNER LLP 55 Hudson Yards New York, NY 10001 Telephone: (212) 446-2300 Fax: (212) 446-2350 ybarkai@bsfllp.com

David E. Mills (pro hac vice)
Joshua M. Siegel (VSB 73416)
COOLEY LLP
1299 Pennsylvania Avenue, NW
Suite 700
Washington, DC 20004
Telephone: (202) 842-7800
Fax: (202) 842-7899
dmills@cooley.com
jsiegel@cooley.com

Karen L. Dunn (pro hac vice)
Jessica E. Phillips (pro hac vice)
William A. Isaacson (pro hac vice)
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, NW
Washington, DC 20005
Telephone: (202) 237-2727
Fax: (202) 237-6131
kdunn@bsfllp.com
jphillips@bsfllp.com
wisaacson@bsfllp.com

Alan Levine (pro hac vice)
Philip Bowman (pro hac vice)
COOLEY LLP
55 Hudson Yards
New York, NY 10001
Telephone: (212) 479-6260
Fax: (212) 479-6275
alevine@cooley.com
pbowman@cooley.com

J. Benjamin Rottenborn (VSB 84796) WOODS ROGERS PLC 10 South Jefferson St., Suite 1400 Roanoke, VA 24011 Telephone: (540) 983-7600 Fax: (540) 983-7711 brottenborn@woodsrogers.com eashwell@woodsrogers.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2020, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

Elmer Woodard 5661 US Hwy 29 Blairs, VA 24527 isuecrooks@comcast.net

James E. Kolenich Kolenich Law Office 9435 Waterstone Blvd. #140 Cincinnati, OH 45249 jek318@gmail.com

Counsel for Defendants Jason Kessler, Nathan Damigo, Identity Europa, Inc. (Identity Evropa), Matthew Parrott, and Traditionalist Worker Party

Justin Saunders Gravatt
David L. Campbell
Duane, Hauck, Davis & Gravatt, P.C.
100 West Franklin Street, Suite 100
Richmond, VA 23220
jgravatt@dhdglaw.com
dcampbell@dhdglaw.com

Counsel for Defendant James A. Fields, Jr.

William Edward ReBrook, IV The ReBrook Law Office 6013 Clerkenwell Court Burke, VA 22015 edward@rebrooklaw.com

Counsel for Defendants Jeff Schoep, National Socialist Movement, and Nationalist Front

John A. DiNucci Law Office of John A. DiNucci 8180 Greensboro Drive, Suite 1150 McLean, VA 22102 dinuccilaw@outlook.com

Counsel for Defendant Richard Spencer

Bryan Jones 106 W. South St., Suite 211 Charlottesville, VA 22902 bryan@bjoneslegal.com

Counsel for Defendants Michael Hill, Michael Tubbs, and League of the South

I further hereby certify that on March 11, 2020, I also served the following non-ECF participants, via electronic mail, as follows:

Christopher Cantwell christopher.cantwell@gmail.com

Vanguard America c/o Dillon Hopper dillon_hopper@protonmail.com

Robert Azzmador Ray azzmador@gmail.com

Elliott Kline a/k/a Eli Mosley eli.f.mosley@gmail.com deplorabletruth@gmail.com

Matthew Heimbach matthew.w.heimbach@gmail.com

/s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)

COOLEY LLP

Counsel for Plaintiffs